

August 2, 2017

VIA ECF:

Magistrate Judge Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Gatti v. Luxor Limo, Inc.
Civil Index No.: 1:16-cv-05655
GS File No.: 9101.0246

Dear Judge Reyes:

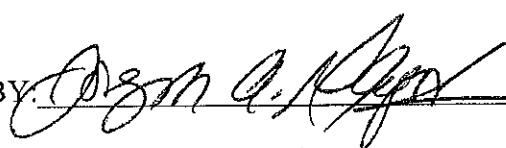
Our office represents defendants Luxor Limo, Inc. and Schlomo Chkifati in the above referenced matter. As discussed on the July 27, 2017 telephone conference with the Court, below please find our proposed updated discovery schedule. We apologize same was not filed yesterday.

1. Plaintiff shall appear for further deposition on or before August 30, 2017 at 149 New Dorp Lane, Staten Island, New York 10306.
2. Plaintiff shall appear for an Independent Medical Evaluation with Dr. Alan Zimmerman on or before August 30, 2017.
3. Plaintiff shall supplement his Rule 26(a)(2)(c) Expert Disclosures to include cost of doctors testimony and testimony history by September 27, 2017.
4. Defendants to exchange Expert Reports by September 27, 2017.
5. Parties to complete all depositions of any expert witnesses by October 27, 2017.
6. All discovery to be completed by October 30, 2017.

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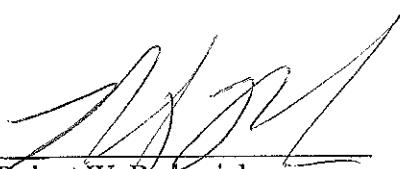
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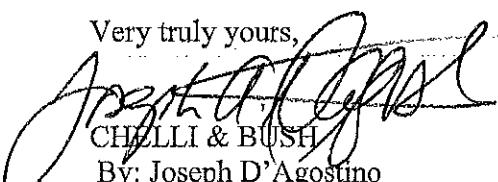
As you are aware our firm represents plaintiff Albert J. Gatti regarding the above referenced personal injury action.

A proposed discovery schedule was to be filed by yesterday. Unfortunately our office had this matter improperly calendared. I apologize for whatever inconvenience and delay this has caused the court and defense counsel. I respectfully request that the Court permit Plaintiff to file the discovery schedule at this time.

I have spoken with Robert W Berbenich of Golberg Segalla LLP, attorneys for defendant, regarding the proposed discovery schedule. I have reviewed the proposed updated discovery schedule as submitted by Mr. Berbenich and agree with the proposed discovery schedule as forwarded to your Honor by defense counsel earlier today.

Please accept same with my sincerest apologies.

Very truly yours,


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